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5 Attorney for Defendant/Counter-claimant  
DASAGROUP HOLDINGS CORP.

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 JEFFERIES FUNDING, LLC,

**Case No. 24-cv05639-TLT**

11 Plaintiff,

**STIPULATION OF PARTIES TO  
REVISED DISCOVERY COMPLIANCE  
DATES AND REQUEST FOR COURT  
ORDER**

12 v.  
13 DASAGROUP HOLDINGS CORP. (D/b/a  
KICKHASS AVODACOS) and LONDON FRUIT,  
14 INC.,

15 Defendants.

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16 DASAGROUP HOLDINGS CORP. (d/b/a  
17 KICKHASS AVOCADOS),

18 Counter-and Cross-Claimant/  
& Third-Party Plaintiff,

19 v.  
20 JEFFERIES FUNDING, LLC,

21 Counter-Defendant,

22 LONDON FRUIT, INC., and

23 Cross-Defendant,

24 SILO TECHNOLOGIES, INC.,

25 Third-Party Defendant.

1           The Parties hereto, Plaintiff/Counter Defendant Jefferies Funding LLC and Third-Party  
 2 Defendant SILO TECHNOLOGIES, INC., by and through their counsel of record, Stosh Silivos,  
 3 Esq., and Defendant/Counter-claimant DASAGROUP HOLDINGS CORP., by and through its  
 4 Counsel of record, Andrew Alexander Dósa, of the Law Offices of Andrew Dósa, respectfully  
 5 request an order of the court to modify the dates by which Defendants will comply with the  
 6 Discovery Order issued by the court on December 11, 2025, based on a recognition of the amount  
 7 of materials, documents, and media files in the possession of Defendants that needs to be reviewed  
 8 and evaluated, and in acknowledging that counsel for Defendant Dasagroup has only recently  
 9 substituted in as counsel of record.

10           Further, based on conversations between Andrew Dósa and the other defendant, Philip Ward,  
 11 counsel represents to the court that Defendant Ward consents and stipulates with all counsel to these  
 12 modified dates and joins in requesting the court modify its orders.

13           The parties request that this court impose a new order as follows:

14           1.       Defendant Philip A. Ward (a/ka/ Felipe Ward) (hereinafter “Ward”) is **ORDERED**  
 15 to serve substantive amended responses to Jefferies Funding LLC’s (“Jefferies”) First Set of  
 16 Interrogatories to Ward by no later than January 23, 2026.

17           2.       Dasagroup is **ORDERED** to serve substantive responses to Silo Technologies, Inc.’s  
 18 (“Silo”) First and Second Sets of Interrogatories to Dasagroup by no later than January 23, 2026.

19           3.       Dasagroup is **ORDERED** to provide amended responses to Jefferies’ Requests for  
 20 Admission 1 and 2 by no later than January 23, 2026.

21           4.       Dasagroup is **ORDERED** to produce documents sufficient to show all capital  
 22 contributions to Dasagroup, including but not limited to all initial capital contributions, by no later  
 23 than January 23, 2026.

24           5.       It is **ORDERED** that, by no later than January 23, 2026, Dasagroup must either (i)  
 25 produce the media files associated with the text and WhatsApp messages it previously produced; or  
 26 (ii) represent that the files are inconsequential. Failure to produce any such media files by January  
 27 23, 2026 shall automatically preclude Dasagroup from using them for any purpose in this action.

6. Dasagroup is **ORDERED** to confirm that it has completed its document production by no later than January 23, 2026.

7. Dasagroup is **ORDERED** to produce a Rule 30(b)(6) witness for deposition on or before February 28, 2026.

8. Without prejudging the merits, Jefferies is granted leave, at its option, to file a motion for sanctions under Local Rule 37-4 by no later than February 28, 2026.

9. Fact discovery is otherwise closed, consistent with the Revised Final Case Management Order. [Dkt. 136].

This **RESOLVES** Dkts. 165 & 187.

Dated: December 22, 2025

HOLLAND & KNIGHT LLP

By: /s/ Stosh Silivos

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Stosh Silivos, Esq., Counsel for  
Plaintiff/Counter Defendant Jefferies Funding LLC  
and Third-Party Defendant SILO TECHNOLOGIES

Dated: December 22, 2025

Law Offices of Andrew Dósa

By: /s/ Andrew Alexander Dósa

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Andrew Alexander Dósa, Esq.  
Attorney for Defendant/Counter Claimant  
Dasagroup Holdings Corp.

## **Filer's Attestation**

The filing attorney attests that he has obtained concurrence regarding the filing of this document and its content from the signatories to this document.

IT IS SO ORDERED:

Dated: December 23, 2025



PETER H. KANG  
United States Magistrate Judge

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